

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SONY BMG CD
TECHNOLOGIES LITIGATION

Case No. 1:05-cv-09575-NRB

DECLARATION OF DANIEL LYNCH IN SUPPORT OF PLAINTIFFS' CLASS COUNSELS'
APPLICATION FOR ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES

I, Daniel Lynch, declare as follows:

1. I am an attorney in good standing, duly licensed and admitted to the Courts of the State of Illinois and Colorado, and numerous United States District Courts (not including the Southern District of New York). I was formerly a partner in the firm of Cirignani Heller Harman & Lynch, counsel of record for Andrew Klewan and James Springer In Re SonyBMG Audio Compact Disc Litigation MDL No. 1750 and am now a partner in the firm of Law Offices Of Daniel Lynch, which was formed on February 1, 2006, and has provided services to plaintiffs since that date.

2. I submit this declaration in support of Plaintiffs' Class Counsels' application for attorneys' fees and reimbursement of expenses in the above-entitled matter. The testimony set forth in this declaration is based on first-hand knowledge, about which I would and could testify competently in open court if called upon to do so, and on contemporaneously-generated records kept in the ordinary course of business.

2. The total number of professional hours expended in the litigation by Cirignani Heller Harman & Lynch, and Law Offices of Daniel Lynch is 26.5. The total lodestar amount for attorney time expended by these firms in the course of the litigation, based upon current rates, is \$11,265.50. All of this time was expended by me, at a rate of \$425.00 per hour. The time reflected in this declaration was time actually spent, in the exercise of reasonable judgment, by me in connection with prosecuting the claims in the action, and all the time was essential to the prosecution and resolution of the litigation, including legal and factual research, drafting of pleadings, and settlement negotiations. My firm was careful not to expend unnecessary hours and not to duplicate work done by others.

3. While we expended un-reimbursed expenses in connection with prosecution of the litigation on behalf of Andrew Klewan and James Springer, these expenses are *de minimus*, and are not sought to be reimbursed.

I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct.

Executed this 27th day of March, 2006, at Chicago, Illinois.



Daniel Lynch

Daniel Lynch's Summary for In re SonyBMG
Audio Compact Disc Litigation

1-Nov	DFL	Study case background; review applicable law	1.25
2-Nov	DFL	Countinue study of underlying facts and causes of action	1.50
7-Nov	DFL	Study Preston memo; office conference with E. Preston, study news reports, work on complaint	2.25
8-Nov	DFL	Study competing case filings	1.50
9-Nov	DFL	Work on proposed complaint	1.00
10-Nov	DFL	Work on proposed pleading; work on factual investigation	2.50
11-Nov	DFL	Work on complaint	2.50
14-Nov	DFL	factual research re: outstanding issues and computer damage; work on complaint	3.00
15-Nov	DFL	Work on complaint	2.25
16-Nov	DFL	Study news reports and other case filings	1.50
18-Nov	DFL	Study cases/facts re: additional causes of action	1.75
13-Dec	DFL	Study recent pleadings; TT O. Giskan re: status	1.50
16-Dec	DFL	Study court filings re: MDL	1.50
20-Dec	DFL	TT O. Giskan re: matter	0.25
9-Jan	DFL	Study pleadings as filed	1.00
10-Jan	DFL	TT. J. Solotaroff re: current status	0.25
11-Jan	DFL	Study pleadings and e-mail correspondence	0.25
7-Feb	DFL	TT O Giskan re: status	0.75
			26.50